1 2 3 4 5 6	Gerald Singleton, SBN 208783 John C. Lemon, SBN 175847 SINGLETON LAW FIRM, APC 450 A Street, 5 <sup>th</sup> Floor San Diego, CA 92101 Tel: (619) 771-3473 Fax: (619) 255-1515 Email: gerald@slffirm.com john@slffirm.com Attorneys for SLF Fire Victim Claimants	
7 8	NORTHERN DISTI	S DISTRICT COURT RICT OF CALIFORNIA
9		ISCO DIVISION
10	In re	) Case No. 19-30088 (DM)
11	PG&E CORPORATION,	Chapter 11
12	and	(Lead Case–Jointly Administered)
13	PACIFIC GAS AND ELECTRIC COMPANY	NOTICE OF SUBPOENAS ISSUED TO CALIFORNIA DEPARTMENT OF
14	Debtors	FORESTRY AND FIRE PROTECTION
15		
16		
17		
18		26, 2019, Individual Claimants represented by the
19	attorneys listed above seek to serve fifteen (15) s	ubpoenas to produce documents, information, or
20	objects on the Custodian of Records of the Califo	ornia Department of Forestry and Fire Protection.
21	Copies of these subpoenas are attached hereto as	"EXHIBIT 1".
22	Res	pectfully submitted,
23	Dated: August 19, 2019	SINGLETON LAW FIRM, APC
24	By:	
25		Gerald Singleton John C. Lemon
26		orneys for the Singleton Law n Fire Victim Claimants
27		
28		1

# EXHIBIT 1

UNITED STATE	ES BANKRUP	TCY COURT	
Northern	District of	California	
In re PG&E CORPORATION  Debtor  (Complete if issued in an adversary proceeding)	Case No	19-30088 11	
Plaintiff v.  Defendant	Adv. Proc. N	lo	
SUBPOENA TO PRODUCE DOCUMENT INSPECTION OF PREMISES IN A BANGE To: California Department of Forestry and Fire Protect (Name of pe	KRUPTCY CASE	(OR ADVERSARY PRO	
Production: YOU ARE COMMANDED to prod documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	ts, and to permit inspec	ction, copying, testing, or sar	npling of the
PLACE Singleton Law Firm, 450 A St., 5th Floor, San Diego, Ca	A 92101	DATE AND TIME 09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or same PLACE	ne, date, and location s	set forth below, so that the review designated object or operation	questing party
FLACE		DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of complian subpoena; and Rule 45(e) and 45(g), relating to your didoing so.  Date:08/26/19	ice; Rule 45(d), relating	g to your protection as a pers	son subject to a
Signature of Clerk or Deputy C	OR G	wald singular torney's signature	
	quests this subpoena, a	re:	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9	92101. gerald@SLFfirr	n.com. (619) 771-3473	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)  I served the subpoena by delivering a copy to the named per	rson as follows:
on (date) *	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is	res, for a total of \$
Date:	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

Case: 19-30088 Doc# 3601 Filed: 08/19/19 Entered: 08/19/19 16:16:44 Page 4 of

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer, or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed, R, Civ, P, 45(a) Committee Note (2013)

UNITED STATE	es Bankrui	PTCY COURT	
Northern	_ District of	California	
In re PG&E CORPORATION  Debtor  (Complete if issued in an adversary proceeding)		19-30088 11	
Plaintiff v.  Defendant	Adv. Proc.	No	
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN  To: California Department of Forestry and Fire Protect	KRUPTCY CASI	ION, OR OBJECTS OR TO E (OR ADVERSARY PRO	O PERMIT CEEDING)
	rson to whom the subp	oena is directed)	- w
Production: YOU ARE COMMANDED to production, or objects documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017) I	s, and to permit insp	ection, copying, testing, or sam	pling of the
PLACE Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	A 92101	DATE AND TIME 09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDION other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, and the controlled by you at the controlled	ne, date, and location	set forth below, so that the req	uesting party
PLACE		DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date:08/26/19	ce; Rule 45(d), relati	ng to your protection as a perso	on subject to a
CLERK OF COURT	_		
	OR C	Rald Lington	
Signature of Clerk or Deputy Cl	lerk	Attorney's signature	
The name, address, email address, and telephone number Claimants , who issues or requirements			
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9	2101, gerald@SLFf	irm.com, (619) 771-3473	
Notice to the person w	ho iceuse or rooms	te this subposes	

Notice to the person who issues or requests this subpoena

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I received this subpoena for (name of individual and title, if any on (date)	v):
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow	or one of its officers or agents, I have also tendered to the yed by law, in the amount of \$
My fees are \$ for travel and \$ for service	
I declare under penalty of perjury that this information i	s true and correct.
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

United State	es Banki	RUPTO	CY COURT	
Northern	_ District of		California	
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PLACE Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	A 92101		DATE AND TIME 09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDED other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample.	ne, date, and loca	ation set f	orth below, so that the rec	questing party
PLACE			DATE AND TIME	
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CLERK OF COURT				
	OR	Goal	l Lington  ney's signature	
Signature of Clerk or Deputy C	lerk –	Attor	ney's signature	
The name, address, email address, and telephone number Claimants , who issues or req	uests this subpo	ena, are:		
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA S				
nouce to the derson w	vuo issues or re	uuests th	is suppoena	

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Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information Date:	tes, for a total of \$
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	Printed name and title
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Case: 19-30088 Doc# 3601 Filed: 08/19/19 Entered: 08/19/19 16:16:44 Page 10

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UNITED STAT	ES BANKR	.UPTC	Y COURT	
Northern	District of		California	
In re PG&E CORPORATION				
Debtor			10 20000	
(Complete if issued in an adversary proceeding)	Case N	0	19-30088	
	Chapte	r11		
Plaintiff				
V.	Adv. P	oc. No.		
Defendant		-		
SUBPOENA TO PRODUCE DOCUMENT INSPECTION OF PREMISES IN A BAN				
To: California Department of Forestry and Fire Protect				
(Name of po	erson to whom the s	ubpoena is	s directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	cts, and to permit i	nspection	, copying, testing, or san	npling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, C	CA 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or same PLACE	me, date, and loca	tion set fo	orth below, so that the recignated object or operati	questing party
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CLERK OF COURT				
Signature of Clerk or Deputy (	OR Clerk		L Lington  ney's signature	
The name, address, email address, and telephone numb	har of the attamas	*AN*AGA**	ting (name of a sut.)	
	quests this subpoe		ing (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA	92101, gerald@S	LFfirm.co	m, (619) 771-3473	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	N
I served the subpoena by delivering a copy to the named per	rson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service.	ved by law, in the amount of \$
I declare under penalty of perjury that this information	is true and correct.
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
  - (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATE	ES BANKR	<b>UPT</b> (	CY COURT	
Northern	_ District of _		California	
In re PG&E CORPORATION				
Debtor	Casa N	2	19-30088	
(Complete if issued in an adversary proceeding)	Case IV	J	19-30000	
	Chapter	1	1	
Plaintiff				
V.	Adv. Pr	oc. No.		
Defendant				
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORMA KRUPTCY CA	ATION ASE (O	, OR OBJECTS OR TO R ADVERSARY PRO	D PERMIT CEEDING)
To: California Department of Forestry and Fire Protect				
(Name of pe	rson to whom the s	ubpoena	is directed)	
Production: YOU ARE COMMANDED to prod documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	s, and to permit in	rspection	n, copying, testing, or samp	oling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, C	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or same PLACE	ie, date, and locat	ion set f	orth below, so that the requ	esting party
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of complian subpoena; and Rule 45(e) and 45(g), relating to your dudoing so.  Date:08/26/19	ce; Rule 45(d), re	lating to his subp	your protection as a perso oena and the potential cons	n subject to a
	OR (	Deal of	Lington  ney's signature	
Signature of Clerk or Deputy C	Terk —	Attor	ney's signature	
The name, address, email address, and telephone number Claimants , who issues or req	uests this subpoer	na, are:		
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA S				
Notice to the person w	ho issues or req	uests th	is subpoena	

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	y):
on (date)•	
I served the subpoena by delivering a copy to the named pe	rson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information Date:	ces, for a total of \$
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.
  - (2) Claiming Privilege or Protection.
- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

UNITED STATE	ES BANKRI	JPTC	CY COURT	
Northern Northern	_ District of		California	
In re PG&E CORPORATION				
Debtor		9	40.00000	
(Complete if issued in an adversary proceeding)	Case No		19-30088	
7,	Chapter	11		
Plaintiff				
V.	Adv. Dro	o No		
Defendant	Auv. Fit	C. NO.	-	
SUBPOENA TO PRODUCE DOCUMENINSPECTION OF PREMISES IN A BANK	TS, INFORMA KRUPTCY CA	TION, SE (OI	OR OBJECTS OR T R ADVERSARY PRO	TO PERMIT DCEEDING)
To: California Department of Forestry and Fire Protect	ion			
	rson to whom the su	bpoena i	s directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017)	s, and to permit in	spection	n, copying, testing, or sar	npling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	<del>\</del> 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDED other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the time may inspect, measure, and the controlled by you at the time may inspect, measure, survey, photograph, test, or sample of the controlled by you at the controlled by yo	ne, date, and locati	on set fo	orth below, so that the resignated object or operation	questing party
PLACE			DATE AND TIME	
			<u></u>	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date: 08/26/19	ce; Rule 45(d), rel	ating to	your protection as a pers	son subject to a
CLERK OF COURT				
	OR —	Geral	Lington ney's signature	
Signature of Clerk or Deputy Cl	iei K	Attori	ney's signature	
The name, address, email address, and telephone number Claimants, who issues or requ			ting (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9			om, (619) 771-3473	

Notice to the person who issues or requests this subpoena

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow	or one of its officers or agents, I have also tendered to the wed by law, in the amount of \$
My fees are \$ for travel and \$ for service	es, for a total of \$
I declare under penalty of perjury that this information	is true and correct.
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

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- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
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- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

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- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed, R, Civ, P, 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STAT	ES BANK	RUPT	CY COURT	
Northern	District of		California	
In re PG&E CORPORATION				
Debtor	Casa	Ma	10 20000	
(Complete if issued in an adversary proceeding)	Case	No	19-30088	
	Chap	er1	1	
Plaintiff				
v.	Adv.	Proc. No.		
Defendant			· · · · · · · · · · · · · · · · · · ·	
SUBPOENA TO PRODUCE DOCUMENT INSPECTION OF PREMISES IN A BAN	NTS, INFORM NKRUPTCY (	IATION CASE (C	N, OR OBJECTS OR TO OR ADVERSARY PRO	O PERMIT CEEDING)
To: California Department of Forestry and Fire Protect				
(Name of pe	erson to whom the	subpoena	is directed)	
Production: YOU ARE COMMANDED to prod documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	ts, and to permit	inspection	on, copying, testing, or sam	pling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, C	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the tirmay inspect, measure, survey, photograph, test, or same PLACE	ne, date, and loc	ation set	forth below, so that the req	uesting party
The following provisions of Fed. R. Civ. P. 45 attached – Rule 45(c), relating to the place of complian subpoena; and Rule 45(e) and 45(g), relating to your didoing so.  Date:08/26/19	nce; Rule 45(d),	relating to	o your protection as a perso	on subject to a
	OR		11 li Ata	
		$=$ $\bigcirc$ $\bigcirc$	rney's signature	
Signature of Clerk or Deputy C	Clerk	Atto	rney's signature	
The name, address, email address, and telephone numb			nting (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA			com, (619) 771-3473	
Notice to the person v	who issues or re	quests th	ris subnoena	

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on <i>(date)</i>	
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow	ved by law, in the amount of \$
My fees are \$ for travel and \$ for service	ees, for a total of \$
I declare under penalty of perjury that this information	is true and correct.
Date:	
	Server's signature
N	
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

Case: 19-30088 Doc# 3601 Filed: 08/19/19 Entered: 08/19/19 16:16:44 Page 22

#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
  - (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative, In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information, These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

United State	es Bankf	RUPT	CY COURT	
Northern	_ District of		California	
In re PG&E CORPORATION  Debtor  (Complete if issued in an adversary proceeding)		lo	19-30088 11	
Plaintiff v. Defendant	Adv. P	roc. No.		
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN  To: California Department of Forestry and Fire Protect	KRUPTCY C			
	rson to whom the	subpoend	a is directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017)	s, and to permit	inspection	on, copying, testing, or sar	npling of the
PLACE Singleton Law Firm, 450 A St., 5th Floor, San Diego, C <i>A</i>	A 92101		DATE AND TIME 09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDIO other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or same	ne, date, and loca	ation set	forth below, so that the re esignated object or operat	questing party
PLACE			DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date:08/26/19 CLERK OF COURT	ce; Rule 45(d), r	elating t	o your protection as a pers	son subject to a
CLERK OF COURT				
	OR	Gu	Il Lington	
Signature of Clerk or Deputy Co	lerk –	Atto	rney's signature	
The name, address, email address, and telephone number Claimants, who issues or req				
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9				
Notice to the person w	uho iganoa on no		hia anhaasa	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information	ved by law, in the amount of \$  ees, for a total of \$
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

Case: 19-30088 Doc# 3601 Filed: 08/19/19 Entered: 08/19/19 16:16:44 Page 25

#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (g) Contempt. The court for the district where compliance is required and also, after a motion is transferred, the issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATI	ES BANK	RUPT	CY COURT	
Northern	_ District of		California	
n re PG&E CORPORATION				
Debtor	Casa	Ma	19-30088	
(Complete if issued in an adversary proceeding)	Case	NO	19-30000	
	Chapt	er 1	1	
Plaintiff				
v.	Adv.	Proc. No.		
Defendant				
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORM	IATION CASE (C	N, OR OBJECTS OR TO OR ADVERSARY PRO	O PERMIT CEEDING)
To: California Department of Forestry and Fire Protect				
(Name of pe	rson to whom the	subpoend	is directed)	
Production: YOU ARE COMMANDED to prod documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	ts, and to permit	inspection	on, copying, testing, or sam	pling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, Ca	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or same PLACE	ne, date, and loc	ation set	forth below, so that the req	uesting party
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of complian subpoena; and Rule 45(e) and 45(g), relating to your dudoing so.  Date:08/26/19	ce; Rule 45(d),	relating to	o your protection as a perso	on subject to a
CLERK OF COURT				
	OR	Gu	ald Lington	
Signature of Clerk or Deputy C	- Elerk		rney's signature	
The name, address, email address, and telephone numb			nting (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA	_		com, (619) 771-3473	
Notice to the person v	vho issues or re	auests tl	nis subnoena	

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service.	yed by law, in the amount of \$
I declare under penalty of perjury that this information is	s true and correct.
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer, or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
  - (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

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- (1) Producing Documents or Electronically Stored Information, These procedures apply to producing documents or electronically stored information:
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# (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATE	ES BANKI	RUPTO	CY COURT	
Northern	District of		California	
In re PG&E CORPORATION				
Debtor		7	10.20000	
(Complete if issued in an adversary proceeding)	Case I	NO	19-30088	
	Chapte	er1	1	
Plaintiff				
V.	Adv. F	roc. No.		
Defendant				
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORM	ATION ASE (O	, OR OBJECTS OR TO R ADVERSARY PRO	O PERMIT CEEDING)
To: California Department of Forestry and Fire Protect				
(Name of per	rson to whom the	subpoena	is directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017)	s, and to permit	inspectio	n, copying, testing, or sam	pling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDION other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample PLACE	ne, date, and loca	ation set 1	Forth below, so that the requirements of signated object or operation	uesting party
TENCE			DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliand subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date:08/26/19	ce; Rule 45(d), r	elating to	your protection as a perso	on subject to a
CLERK OF COURT				
	OR	GRA	Id Lington	
Signature of Clerk or Deputy Cl	lerk –		ney's signature	
The name, address, email address, and telephone number Claimants , who issues or requ			nting (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9			om, (619) 771-3473	
Notice to the person w				

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	y:
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service.	yed by law, in the amount of \$
I declare under penalty of perjury that this information	s true and correct.
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer, or
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# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
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- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.
- (2) Claiming Privilege or Protection.
- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATE	ES BANKR	UPTC	y Court	
Northern	_ District of _		California	
In re PG&E CORPORATION				
Debtor	Cara N		10 20000	
(Complete if issued in an adversary proceeding)	Case No	)	19-30088	
	Chapter	11		
Plaintiff				
v.	Adv. Pro	oc. No.		
Defendant		87		
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORMA KRUPTCY CA	ATION, ASE (OF	OR OBJECTS OR TO R ADVERSARY PRO	O PERMIT CEEDING)
To: California Department of Forestry and Fire Protect	tion			
	rson to whom the si	ibpoena is	s directed)	
Production: YOU ARE COMMANDED to production, or objects documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017) I	s, and to permit in	spection	, copying, testing, or sam	pling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDION other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample PLACE	ne, date, and locat	ion set fo	orth below, so that the req	uesting party
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date:08/26/19	ce; Rule 45(d), rel	ating to	your protection as a perso	n subject to a
CLERK OF COURT				
	OR	Geal	d Lington	
Signature of Clerk or Deputy Cl	lerk —	Attorn	ey's signature	
The name, address, email address, and telephone number Claimants , who issues or requ			ing (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9			m, (619) 771-3473	
Notice to the person w	ho issues or requ	rests this	s subnoana	

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for travel and \$ for the feet fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for the feet feet feet feet feet feet feet	ved by law, in the amount of \$es, for a total of \$
Date:	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

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- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
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- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.
- (g) Contempt. The court for the district where compliance is required and also, after a motion is transferred, the issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

United State	ES BANKRUPTO	Y COURT	
Northern	_ District of	California	
In re PG&E CORPORATION			
Debtor (Complete if issued in an adversary proceeding)	Case No1		
Plaintiff V.	· .		
Defendant			
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORMATION, KRUPTCY CASE (OI	OR OBJECTS OR T R ADVERSARY PRO	TO PERMIT OCEEDING)
To: California Department of Forestry and Fire Protect			
(Name of per	rson to whom the subpoena i	s directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017) I	s, and to permit inspection	, copying, testing, or san	npling of the
PLACE		DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	A 92101	09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDIO other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or samp PLACE	e, date, and location set for	orth below, so that the reignated object or operation	questing party
TENCE		DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.	ce; Rule 45(d), relating to	your protection as a pers	son subject to a
Date:08/26/19 CLERK OF COURT			
CLERK OF COURT			
	OR Gual	L Lingliton	
Signature of Clerk or Deputy Cl	lerk Attorr	ney's signature	
The name, address, email address, and telephone number Claimants	er of the attorney represent uests this subpoena, are:	ing (name of party)	
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9		m, (619) 771-3473	
Natice to the person w			

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	v):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on ( <i>date</i> )	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information is	ved by law, in the amount of \$es, for a total of \$
Date:	
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

# (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

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- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
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- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

# (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

UNITED STATE	ES BANKRUPTO	CY COURT	
Northern	_ District of	California	
In re PG&E CORPORATION			
Debtor		10 20000	
(Complete if issued in an adversary proceeding)	Case No	19-30088	
G.	Chapter 1	1	
Plaintiff			
V.	Adv. Proc. No.		
Defendant			
SUBPOENA TO PRODUCE DOCUMENT INSPECTION OF PREMISES IN A BANK	TS, INFORMATION KRUPTCY CASE (O	, OR OBJECTS OR T R ADVERSARY PRO	TO PERMIT OCEEDING)
To: California Department of Forestry and Fire Protect			
(Name of per	son to whom the subpoena	is directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017) I	s, and to permit inspectio	n, copying, testing, or sar	npling of the
PLACE		DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	92101	09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDION other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample.	e, date, and location set t	forth below, so that the re	questing party
PLACE		DATE AND TIME	
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.	ce; Rule 45(d), relating to	your protection as a pers	son subject to a
Date: 08/26/19			
CLERK OF COURT			
	OR God	ld Linghton	
Signature of Clerk or Deputy Cl	erk Attor	ney's signature	
The name, address, email address, and telephone number of the attorney representing (name of party)  Claimants , who issues or requests this subpoena, are:			
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9	- ·	om, (619) 771-3473	
7.7			

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any	y):
on (date)	
I served the subpoena by delivering a copy to the named per	rson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information Date:	ved by law, in the amount of \$  ces, for a total of \$
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
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- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
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- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
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  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATE	ES BANKRUP'	TCY COURT	
Northern Northern	_ District of	California	
In re PG&E CORPORATION			
Debtor		40.00000	
(Complete if issued in an adversary proceeding)	Case No.	19-30088	*
	Chapter	11	
Plaintiff			
v.	Adv. Proc. N	lo	
Defendant		·	
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORMATIO KRUPTCY CASE	ON, OR OBJECTS OR T (OR ADVERSARY PRO	O PERMIT OCEEDING)
To: California Department of Forestry and Fire Protect			
(Name of per	rson to whom the subpoe	na is directed)	
Production: YOU ARE COMMANDED to production documents, electronically stored information, or objects material: The complete unredacted Adobe Fire (2017)	s, and to permit inspec	tion, copying, testing, or san	pling of the
PLACE		DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, CA	92101	09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMANDION other property possessed or controlled by you at the time may inspect, measure, survey, photograph, test, or sample PLACE	ie, date, and location s	et forth below, so that the rec	questing party
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of compliant subpoena; and Rule 45(e) and 45(g), relating to your du doing so.  Date: 08/26/19	ce; Rule 45(d), relating	to your protection as a person	on subject to a
CLERK OF COURT			
CEERT OF COOK!	2.5		
	OR (	nald Lington	
Signature of Clerk or Deputy Cl	lerk At	will Lington torney's signature	
	The name, address, email address, and telephone number of the attorney representing (name of party)		
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA 9			
Notice to the person w			

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if an	yy):	
on (date)		
I served the subpoena by delivering a copy to the named person as follows:		
on ( <i>date</i> )	; or	
I returned the subpoena unexecuted because:		
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for services.	wed by law, in the amount of \$	
I declare under penalty of perjury that this information	is true and correct.	
Date:		
	Server's signature	
	Printed name and title	
	Server's address	

Additional information concerning attempted service, etc.:

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#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

- (1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction which may include lost earnings and reasonable attorney's fees on a party or attorney who fails to comply.
- (2) Command to Produce Materials or Permit Inspection.
- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.
- (3) Quashing or Modifying a Subpoena.
- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATI	ES BANK	RUPT	CY COURT	
Northern	_ District of		California	
In re PG&E CORPORATION	_			
Debtor	Casa	Na	19-30088	
(Complete if issued in an adversary proceeding)	Case		19-30066	
	Chap	ter	11	
Plaintiff				
V <sub>*</sub>	Adv.	Proc. No	)	
Defendant				
SUBPOENA TO PRODUCE DOCUMEN INSPECTION OF PREMISES IN A BAN	TS, INFORM	IATIO CASE (C	N, OR OBJECTS OR TO OR ADVERSARY PRO	O PERMIT CEEDING)
To: California Department of Forestry and Fire Protect				
(Name of pe	erson to whom the	subpoen	a is directed)	
Production: YOU ARE COMMANDED to prod documents, electronically stored information, or object material: The complete unredacted Adobe Fire (2017)	ts, and to permit	inspecti	on, copying, testing, or samp	pling of the
PLACE			DATE AND TIME	
Singleton Law Firm, 450 A St., 5th Floor, San Diego, C	A 92101		09/26/19	10:00 am
Inspection of Premises: YOU ARE COMMAND other property possessed or controlled by you at the tin may inspect, measure, survey, photograph, test, or sam PLACE	ne, date, and loc	ation set	forth below, so that the requ	uesting party
The following provisions of Fed. R. Civ. P. 45, attached – Rule 45(c), relating to the place of complian subpoena; and Rule 45(e) and 45(g), relating to your dudoing so.  Date:08/26/19	ce; Rule 45(d),	relating 1	to your protection as a perso	n subject to a
CLERK OF COOK!			11 1.06	
	OR	$\bigcirc \emptyset$	ald Singliture	
Signature of Clerk or Deputy C	- lerk	Atto	orney's signature	
The name, address, email address, and telephone number Claimants , who issues or req				(
Gerald Singleton, 450 A St., 5th Floor, San Diego, CA S				
Notice to the person v				

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if an	y):
on (date)	
I served the subpoena by delivering a copy to the named pe	erson as follows:
on (date)	; or
I returned the subpoena unexecuted because:	
Unless the subpoena was issued on behalf of the United States, witness the fees for one day's attendance, and the mileage allow My fees are \$ for travel and \$ for service I declare under penalty of perjury that this information Date:	wed by law, in the amount of \$  ces, for a total of \$  is true and correct.
	Server's signature
	Printed name and title
	Server's address

Additional information concerning attempted service, etc.:

#### (c) Place of compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises, at the premises to be inspected.

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- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

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